



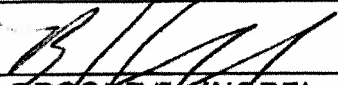
CONSULATE GENERAL OF THE
UNITED STATES OF AMERICA

GENERAL AUTHENTICATION CERTIFICATE

Kingdom of Saudi Arabia)
Western Province) ss:
City of Jeddah)
American Consulate General)

I Certify that the official named below, whose true signature and official seal are, respectively, subscribed and affixed to the annexed document, was, on this day, empowered to act in the official capacity designated in the annexed document, to which faith and credit are due. The Consulate does not assume any responsibility for the contents of the attached document.

Ahmed S. Al-Zahrani


BROOKE E. KNOBEL
CONSUL OF THE
UNITED STATES OF AMERICA

20 SEP 2006

SEAL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al., Case No. 03-CV-9849 (S.D.N.Y.)

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 1:02-6977 (S.D.N.Y.)

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-05970-UA (S.D.N.Y.)

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-07279-UA (S.D.N.Y.)

New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7280 (S.D.N.Y.)

AFFIDAVIT OF MOHAMMAD QASHOU

I, Mohammad Qashou, state under penalty of perjury as follows:

1. I was born in Palestine in 1944 and am a citizen of Jordan. I currently reside in Jeddah, Saudi Arabia. I am proficient in English.

2. I have been the Deputy Managing Director – Technical Affairs of SBG’s Public Buildings & Airports Division (“PBAD”) from approximately 1990 to the present. As Deputy Managing Director – Technical Affairs of PBAD, my job is to study, supervise, and implement the division’s projects in Saudi Arabia and some other countries pursuant to the division’s systems and procedures.

3. In December of 1989, Binladin Overseas (Pvt. Ltd.) was awarded a contract to build the New Port Sudan Airport. PBAD was ultimately responsible for the airport’s construction. Musa Dawood Mustafa was appointed Project Manager and he was responsible for



managing the day-to-day operations of the airport construction project. Construction of the New Port Sudan Airport began in February of 1990 and was substantially completed by mid-1992.

4. Neither Osama Bin Laden ("OBL") nor Al Hijra for Construction and Development was employed, as a contractor or otherwise, on the New Port Sudan Airport project or provided SBG with any type of assistance on the project. Al Hijra for Construction and Development is not a subsidiary of SBG or in any way affiliated with SBG. I have never met OBL, or heard of Al Hijra for Construction and Development or the Tahaddi Road project. I am unaware of any contacts with OBL or Al Hijra for Construction and Development by any employee of PBAD.

5. The New Port Sudan Airport was SBG's only construction project in Sudan. Mohammed Binladin Company did not work on the New Port Sudan Airport project as a subcontractor or otherwise.

6. Neither SBG nor any of its subsidiaries participated in the construction of the Tahaddi Road project or, for that matter, any road construction project in the Sudan. Neither SBG nor any of its affiliates engaged in any joint construction projects with OBL or with Al Hijra for Construction and Development in the Sudan in the 1990's.

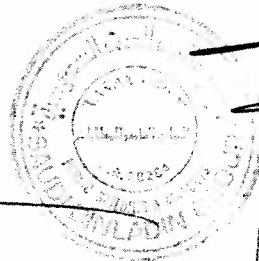
Mohammad Qashou

Sworn to me this ____ day of ____, 2006

Notary Public

My Commission Expires

مصادق وزارة الخارجية
على صحة الحكم والتوقيع
مستولتها عن المحتوي
١٤٢٧
أحمد سعيد الزهراني
Ahmad S. Al-Zahrani



18 Sept 2006
2006/9/19